

JP:WDS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M12-0354**

C O M P L A I N T

(T. 18 U.S.C. § 1546)

-----X  
UNITED STATES OF AMERICA

- against -

OLUWATOSIN TOLULOPE AJIDAHUN,

Defendant.  
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EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER USHER, being duly sworn, deposes and states that he is a Special Agent with the Department of State, Diplomatic Security Service ("DSS"), duly appointed according to law and acting as such.

Upon information and belief, on or about April 5, 2011, within the Eastern District of New York, the defendant OLUWATOSIN TOLULOPE AJIDAHUN, did knowingly and willfully use and attempt to use a United States visa that was procured by means of a false claim or statement and otherwise procured by fraud and unlawfully obtained.

(Title 18, United States Code, Section 1546)

The source of your deponent's information and the grounds for this belief are as follows:<sup>1</sup>

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<sup>1</sup> Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause, I have not set forth all the facts and circumstances of which I am aware.

1. My information comes from a joint investigation of the DSS and the United States Customs and Border Protection agency ("CBP"). I have spoken with CBP Officers, interviewed the defendant and reviewed documents.

2. On April 5, 2012, at approximately 10:00 a.m., the defendant OLUWATOSIN TOLUPE AJIDAHUN, arrived at John F. Kennedy International Airport ("JFK") on Arik Air, Flight No. HFY-107 originating from Lagos, Nigeria. Upon arrival, the defendant presented Nigerian passport #A03618761, issued on February 15, 2012, in the name of "OLUWATOSIN TOLUPE AJIDAHUN," date of birth September 8, 1982, place of birth Lagos, Nigeria, to a CBP officer. The passport contained a B1/B2 visa, Visa Foil No. E2067958 (Control No. 20120730460001), issued by the United States Department of State Bureau of Consular Affairs in Lagos, Nigeria on March 14, 2012.

3. After presenting his passport, the defendant OLUWATOSIN TOLUPE AJIDAHUN, was selected for a secondary inspection by CBP officers.


4. During the secondary inspection, the defendant OLUWATOSIN TOLUPE AJIDAHUN presented his passport and B1/B2 visa and stated that he was a Nigerian citizen. He stated that he was coming to the United States for business and provided the CBP officers with a letter purportedly from "Tara Wood" at XG Technology, Inc., in Sunrise, Florida, to the United States Embassy in Lagos, Nigeria, requesting that the defendant be

issued a one-week entry visa as a "senior executive" of "3i Technology Ltd," so that he could visit the offices XG Technology, Inc. in Florida.

5. Because the letter appeared to have been printed on an inkjet printer, CBP officers contacted XG Technology, Inc., in Florida. A representative of XG Technology, however, confirmed that XG Technology does not do business with any company named 3i Technology, and did not invite the defendant to any meeting in the United States.

6. Upon further questioning, in sum and in part, the defendant OLUWATOSIN TOLUOPE AJIDAHUN admitted that he had procured false documents from an individual in Nigeria to obtain the B1/B2 Visa and that he had made false statements when he applied for a United States visa. In particular, the defendant admitted that the letter of invitation from XG Technology was fraudulent and that he had no intention of visiting Florida. The defendant further admitted that he had sold similar fraudulent documents to another individual for the purpose of applying for a United States visa. The defendant further admitted that he made false statements to U.S. Department of State officials at the U.S. Consulate in Lagos when he was interviewed in connection with his visa application.

WHEREFORE, your deponent respectfully requests that the defendant OLUWATOSIN TOLULOPE AJIDAHUN, be dealt with according to law.

  
CHRISTOPHER USHER  
Special Agent  
United States Department of  
State

Sworn to before me this  
11<sup>th</sup>/day of April, 2012 ✓

The Honorable Marylyn D. Go  
United States Magistrate Judge  
Eastern District of New York